REMARKS

This is in response to the Official Action mailed March 28, 2003, in which claims 7-14 were rejected.

In the Official Action, the Examiner rejected claims 7-14 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Specifically, the Examiner asserts that independent claims 7 and 12 are indefinite on four bases.

First, the Examiner asserts that claims 7 and 12 are indefinite "because it is unclear whether this claim requires subjecting a mat with a steam treatment in a steam injection press or merely require[s] generating ... steam from ... moisture in a heated mat", Official Action, page 2 lines 12-14. He then correctly assumes that these claims call for subjecting a mat with a steam treatment. Independent claims 7 and 12 are herein amended. Thus, although these claims already required the use of a steam injection press, they have now been clarified to specify that steam is injected into the mat in that press, and that steam and gaseous issuance are also generated therein.

Second, the Examiner states that the expression "supplying hot air to said steam injection" in independent claims 7 and 12 is confusing, and that it is unclear whether this statement "require[s] exposing a mat with a heated air or not," Official Action, page 2 lines 17-18. The Examiner then further assumes, again correctly, that the mat is exposed to heated air. Applicant herein amends claims 7 and 12 to clarify that the supplying of heated air to the steam injection press includes exposing the mat to heated air by specifying that heated air is supplied "to said mat" as well as to the steam injection press.

Third, the Examiner asserts that the statement "condensation of said steam, said gaseous emissions, and any leakage of air from the surroundings is prevented" is confusing. Applicant disagrees. Using plain rules of English-language sentence structure, it is clear that "is prevented" modifies the three objects, namely: 1. condensation of said steam; 2. said gaseous emissions; and 3. any leakage of air from the surroundings. In order to completely remove any ambiguity, however, Applicant herein amends independent claims 7 and 12 to recite "thereby preventing condensation ... gaseous emissions ..., and ... leakage of air ..."

Fourth, the Examiner also asserts that it is unclear whether claims 7 and 12 "precludes any condensation of steam in a mat", and then correctly assumes that condensation of an injected steam in/on the mat is not precluded. Applicant submits that complete prevention of condensation of steam is not envisioned, as some amount of condensation will invariably occur. Applicant submits that all of the bases for rejection of independent claims 7 and 12, and thus their dependent claims 8-11 and 13-14, for indefiniteness, have been properly addressed and that the rejection should be withdrawn.

The Examiner further rejected claims 7, 10 and 12 under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 5,932,156, to Eriksson, et al., in view of U.S. Patent No. 5,433,905 to Tisch, and further in view of U.S. Patent No. 3,992,135, to Camp, III. The Examiner states that *Eriksson, et al.* teaches a process of making lignocellulosic board that includes: providing a belt press, compressing a mat using the belt press, injecting steam into the mat using the compression rollers, curing the steam-injected mat in the heating zone, and passing the cured mat to a conditioning zone. The Examiner notes, however, that *Eriksson, et al.* does not teach supplying

hot air to a steam injection press (in a "heating zone"), capturing injected steam, volatile organic compounds ("VOCs") and/or gases such as curing agents, although he also states that the emission of VOCs is intrinsically generated/emitted when heat-compressing a mat in a belt process. See Official Action, page 3, line 20 - page 4, line 3.

The Examiner also states that *Tisch* teaches the injection of "gases such as a curing agent" in heat-compressing a mat (Official Action, page 4, lines 4-9), and that it would have been obvious to combine *Tisch* with *Eriksson, et al.* While the present invention does not claim the injection of a "curing agent" per se, the Examiner asserts that it would be obvious from the combination to provide a process that includes injection of "gases such as a curing agent" to "accelerate the curing of a resin in a fiber mat during a heat-compression operation in a belt press". See Official Action page 4, lines 4-8.

First, there is no teaching, motivation or suggestion to combine *Eriksson, et al.* with *Tisch.* The Examiner thus attempts to equate the injection of "hot air" in the steam injection press as in the present invention with *Tisch*'s injection of "gases such as a curing agent". In Tisch, the "gases such as a curing agent" are injected in order to "effect or accelerate the curing". See Tisch, column 8, lines 26-40.

In the present invention, hot air is injected "to prevent the emissions and the steam from condensing out into the suction system", specification, page 3, lines 11-12. Thus, the hot air is injected to maintain a high temperature, not to "effect or accelerate curing". Therefore, not only is there no motivation to combine *Eriksson, et al.* and *Tisch*, but such a combination would still not include the injection of hot air in

the steam-injection press so as to maintain a high temperature preventing condensation of the steam and/or emissions.

The Examiner further states that *Camp, III* teaches the injection of heated air into the platen in a heat zone of a belt press, and that it would have been obvious to supply a heated compressed air having a temperature of 350° F to a pair of curing platens in the modified process of *Eriksson, et al.* and *Tisch*. See Official Action, page 4, line 20 - page 5, line 1.

Camp, III, however, also uses hot air for completely different purposes than the present invention, namely to "counteract" the tendency of the rollers to deflect under the forces exerted by the mat" and for "curing purposes". See *Camp III*, column 7, lines 8-10 and 26-28. Thus, any combination of *Eriksson, et al., Tisch* and *Camp, III* would not prevent the condensation of steam and/or emissions as such condensation is prevented in the present invention. Therefore, any combination of these references would still not render the present invention obvious and the rejections should be withdrawn.

The Examiner further rejected several dependent claims based on 35 U.S.C. §103(a) as being unpatentable over the aforementioned combinations of *Eriksson et al., Tisch* and *Camp, III*, in further view of several references, including Admitted Prior Art ("APA"), U.S. Patent No. 5,815,943 to *Puumalainenl*, U.S. Patent No. 5,387,782 to *Holik*, U.S. Patent No. 4,932,139 to *Lehtinen*, and U.S. Patent No. 4,424,634 to *Westelaken*. Notably, none of the additional references provide for the addition of hot air to prevent condensation of steam and/or emissions, as in the independent claims of the present invention, from which the rejected claims depend. Thus, no combination of the cited references would render the present invention obvious. Consequently, Applicant considers that the claims as originally

filed distinguish over the prior art, and requests that the Examiner withdraw his rejections under 35 U.S.C. §103(a).

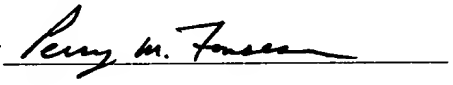
As it is believed that all of the rejections set forth in the Official Action have been fully met, favorable reconsideration and allowance are earnestly solicited.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he/she telephone applicant's attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: September 19, 2003

Respectfully submitted,

By 

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